IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

STORE CAPITAL ACQUISITIONS, LLC, a Delaware limited liability company, and

STORE MASTER FUNDING XIII, LLC, a

Delaware limited liability company,

CIVIL ACTION – BREACH OF

CONTRACT

Plaintiffs.

No. 19-CV-685

v.

5171 CAMPBELLS LAND CO., INC. a Pennsylvania corporation, WILLIAM KANE,

FRANK KANE, and RON LINABURG,

Defendants.

NOTICE OF EXPIRATION OF 60-DAY STAY

Plaintiffs STORE Capital Acquisitions, LLC and STORE Master Funding XIII, LLC (collectively, "Plaintiffs"), through their undersigned counsel, hereby file this Notice of Expiration of 60-Day Stay and represent as follows:

Plaintiffs filed their complaint (the "Complaint") initiating this matter on June 12, 2019. On July 29, 2019, this Court entered its order (the "Order") [Dkt. 24] instituting a voluntary 60day stay of proceedings (the "Stay") in this case in light of the bankruptcy filed by Defendant 5171 Campbells Land Co., Inc. ("5171"). As noted in the Order, the automatic stay pursuant to 11 U.S.C. § 362 is applicable to 5171, but not to the remaining defendants. On September 20, 2019, Plaintiffs filed their Notice of Voluntary Dismissal of Defendant Ron Linaburg [Dkt. 27] and on September 23, 2019, this Court entered an order dismissing Ron Linaburg [Dkt. 28].

The Stay expired on September 27, 2019. Pursuant to the Order, Plaintiffs file this notice to inform the Court that the Stay has expired and to notify the Court that Plaintiffs are prepared to proceed with this case. Plaintiffs request that the Court enter an order requiring the remaining Defendants, William Kane and Frank Kane, to file an answer to the Complaint on or before October 18, 2019.

REPSECTFULLY SUBMITTED this 4th day of October, 2019

By: /s/ Clifford Sacalis

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CERTIFICATE OF SERVICE

I, Clifford Sacalis, hereby certify that the foregoing Notice of Expiration of 60-Day Stay was served on the following *via the Court's CM/ECF System or email*:

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Counsel for Defendants 5171 Campbells Land Co., Inc. and William Kane

Dated: October 4, 2019	/s/ Clifford Sacalis
	Clifford Sacalis